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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**TANYA MAYHEW, TANVEER ALIBHAI, and**  
**TARA FESTA**, individually on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

**KAS DIRECT, LLC and S.C. JOHNNSON & SON,**  
**INC.,**

Defendants.

Case No. 16 CV 6981 (VB)

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS**

**PLEASE TAKE NOTICE** that on November 14, 2018 at 10:30 a.m., in the U.S. District Court for the Southern District of New York, in Courtroom 521, in the Honorable Charles L. Brieant Jr. Federal Building and U.S. Courthouse, 300 Quarropas Street, White Plains, New York 10601-4150, before the Honorable Vincent L. Briccetti, Plaintiffs Tanya Mayhew, Tanveer Alibhai, and Tara Festa will, and hereby do, move the Court for an order granting attorneys' fees of \$733,333.33; reimbursement of out-of-pocket expenses of \$51,993.28; and service awards totaling \$7,500.00 (\$2,500.00 per Class Representative).

This motion is based upon this notice of motion; the memorandum of law in support of the motion; the Declarations of Katherine Van Dyke, Jason Sultzer, and Amy Boyle; all of the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

Dated: September 26, 2018

**CUNEO GILBERT & LADUCA, LLP**

By: s/ Charles J. LaDuca  
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